

REMARKSI. Introduction

In response to the Office Action dated February 7, 2007, the claims have not been amended. Claims 1-30 remain in the application. Re-examination and re-consideration of the application is requested.

II. Prior Art Rejections

On pages (2)-(8) of the Office Action, claims 1-30 were rejected under 35 U.S.C. §103(a) as being obvious in view of the combination of Bondy et al., U.S. Publication 2002/0191219 (Bondy) and Halpert et al., U.S. Publication 2004/0225958 (Halpert).

Specifically, claims 1, 11 and 21 were rejected as follows:

As to claim 1, Bondy teaches

A computer-implemented method for defining a project in a computer graphics program comprising: (see abstract and background)

(a) obtaining a project file in the computer graphics program comprising general information regarding the project; (project, paragraph [0018])

(b) creating a directory structure in the computer graphics program for the project wherein: (set up directory structure, paragraph [0018])

(i) one or more project drawing files are organized into various folders by drawing file type of the one or more project drawing files; (stored in folders, paragraph [0019])

(ii) the one or more project drawing files are composed of either a building information model for the project or a report generated from the building information model; and (template, paragraph [0020]) and

(iii) the one or more project drawing files are organized into the various folders based on the building information model or the report accordingly; (stored in repository, paragraph [0020])

(c) obtaining a companion file for each project drawing file, wherein each companion file provides information used to create the directory structure (set up directory structure and resources stored into folders in accordance with the configuration file, paragraph [0018]-[0019]) and comprises information to link each project drawing file to the project based on the building information model or the report; (tags to identify resources, paragraph [0019]).

Bondy does not explicitly indicate "(d) displaying, in the computer graphics program on a display device, the one or more project drawing files in the various folders".

However, Halpert discloses "(d) displaying, in the computer graphics program on a display device, the one or more project drawing files in the various folders" (viewer, paragraph [0096]; figure 8).

It would have been obvious to one of ordinary skill in the art at the time the invention was made to combine Bondy and Halpert because using the steps of "(d) displaying, in the computer graphics program on a display device, the one or more project drawing files in the various folders" would have given those skilled in the art the tools give a visual representation of the project structure. This gives the user the advantage of being able to view the project structure.

As per claims 11-20, these claims are rejected on grounds corresponding to the arguments given above for rejected claims 1-10 and are similarly rejected.

As per claims 21-30, these claims are rejected on grounds corresponding to the arguments given above for rejected claims 1-10 and are similarly rejected.

Applicant traverses the above rejections for one or more of the following reasons:

- (1) Neither Bondy nor Halpert teach, disclose or suggest a computer graphics program;
- (2) Neither Bondy nor Halpert teach, disclose or suggest a project file in a computer graphics program;
- (3) Neither Bondy nor Halpert teach, disclose or suggest a drawing in a computer graphics program;
- (4) Neither Bondy nor Halpert teach, disclose or suggest a drawing file have a drawing file type;
- (5) Neither Bondy nor Halpert teach, disclose or suggest organizing a drawing file into a folder based on a drawing file type;
- (6) Neither Bondy nor Halpert teach, disclose or suggest a building information model or a report from a building information model;
- (7) Neither Bondy nor Halpert teach, disclose or suggest organizing drawing files into a folders based on a building information model or report from a building information model;
- (8) Neither Bondy nor Halpert teach, disclose or suggest a companion file for each drawing file; and
- (9) Neither Bondy nor Halpert teach, disclose or suggest a companion file for each drawing file that provides information to both (i) create a directory structure, and (2) to link each drawing file to a project based on the building information model or report.

Independent claims 1, 11, and 21 are generally directed to defining a project in a computer graphics program. More specifically, a project file is obtained that provides general information regarding a project. A directory structure is then created for the project. Project drawing files are organized into various folders of the directory structure by drawing file type. Further, the drawing files are composed of either a building information model component (for the project) or a report generated from the building information model. The organization into the various folders is further based on the model or report accordingly. A companion file for each project drawing file is obtained. Each companion file provides information used to create the directory structure that the files are organized in and also provides information to link each project drawing file to a particular

project (based on the building information model or report). Lastly, the drawing files are displayed in the various folders within the graphics application.

The cited references do not teach nor suggest these various elements of Applicants' independent claims.

Applicants first note that the claimed invention is directed towards a computer graphics program. The preamble requires a computer graphics program and the first claim element obtains a project file in the computer graphics program. In rejecting this claim element, the Office Action relies on the abstract, background, and paragraph [0018] of Bondy. Applicants note that Bondy's abstract indicates that Bondy is directed towards printing a project of documents containing variable data and not a computer graphics program. In this regard, printing documents is not even remotely similar to a computer graphics program or drawings in a computer graphics program. Bondy's background further describes the process of printing fixed data and variable data in a "printing application". Again, a printing application is not a computer graphics program as claimed. Bondy's paragraph [0018] further describes a process for printing variable data document projects. In this regard, Bondy does not teach, describe, suggest, or remotely allude to a computer graphics program.

Applicants further note that the claims provide for project drawing files in the computer graphics program. Such claim limitations also provide that the drawing files are organized into various folders by drawing file type of the drawing files. Such limitations further provide the context of the invention in that it relates to drawings and drawing files in a computer graphics program. In addition, such drawing files are organized based on the type of drawing file. In rejecting this claim element, the Office Action refers to Bondy's "stored in folders" set forth in paragraph [0019].

Paragraph [0019] provides:

[0019] Resources for the project, such as images, fonts, and graphics, are acquired in step 204. Also, in step 204, the resources for the project are stored in folders, i.e. directories, in accordance with the configuration file and tagged with appropriate metadata tags to identify the resources and associate the resources with the proper project and documents. In step 206, test data is acquired. Test data can be any set of data corresponding to expected variable data, such as a single representative record from a database to be used for variable data. In step 208, a counter is added to the file to provide a unique sequence number to each record of the project.

As can be seen from this text, the only mention of graphics is when it is a graphic for a document project. Thus, Bondy still fails to describe a computer graphics program. Further, a drawing file (i.e., a file containing a drawing) is not similar to a document that contains a font or

graphic. Again, a drawing and computer graphics program provide a particular context that is neither hinted at or suggested in Bondy. In addition, the claimed drawing files are organized into folders by drawing file type. Nowhere in the cited text (or remainder of Bondy) is there a remote reference to organizing files (not to mention that they are drawing files) in any location based on the type of file (or type of drawing file) as claimed. Instead, Bondy describes storing resources for the project in folders based on a configuration file. In this regard, the configuration file is not a drawing file type. In addition, the claimed drawing files are stored in the folders based on their own drawing file type and not based on a separate configuration file.

The present claims continue and provide that the project drawing files are composed of either a building information model for the project or a report generated from the model. As can be seen throughout the text of the specification as filed, a building information model is an information model for a building (see paragraphs [0015]-[0017], [0038], [0040], etc.). Accordingly, the use of the term "building information model" in the claims provides a specific meaning and intent that can't merely be ignored. Under MPEP §2142 and 2143.03 "To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). "All words in a claim must be considered in judging the patentability of that claim against the prior art." *In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970)." In this regard, the term "building" that modifies "information model" as used in the claims cannot merely be disregarded. Bondy's template has not relationship whatsoever to a building information model as claimed. Instead, Bondy provides that static portions of a print job are created as a template. Such a teaching is not even remotely similar to a building information model as claimed. The structure and use of the various folders and the drawing files in the particular folders provides functional advantages in the building industry (as further defined in the independent claims). Thus, to equate a template in a printing application with drawing files in a building information model is logically flawed.

In addition, the claims provide that the drawing files are stored/organized in the folders based on the building information model or report. In rejecting this claim element, the Office Action relies on Bondy's repository in paragraph [0020]. However, Bondy merely describes the creation of a markup of a page layout design that is imported into a repository. Bondy then provides that updates are stored in the repository. Such a teaching again fails to describe a claimed

building information model. Further, the claimed limitations relating to the organization of drawing files into folders based on an information model is completely ignored in a mere recitation of a repository that is used for a markup of a page layout design and updates of a static portion of an image. Again, there is not even a remote similarity between Bondy's teaching and the claimed invention with respect to such specifically and explicitly claimed elements.

The present claims then provide that a companion file is created for each project drawing file. In rejecting this claim element, the Office Action relies on Bondy's configuration file. Applicants note that Bondy's configuration file stores "the file structure, ID, and other project specific data" (see paragraph [0018]). Thus, Bondy's configuration file is a single file that is used to store all document project information. Accordingly, Bondy's configuration file is not created separately for each project file as claimed. In this regard, instead of creating a companion file for each project drawing file (as claimed), Bondy creates a single configuration file that is used on a project wide basis. Such a teaching does not and cannot teach the companion files for each project drawing file as claimed.

The present claims then provide that the companion file provides information used to create the directory structure. There is no mention or even remote suggestion in Bondy for creating a directory structure based on the configuration - not to mention creating a directory structure for the companion files that are created for each project drawing file as claimed.

The present claims further provide that each companion file has information to link each project drawing file to the project based on the building information model or the report. Again, a single configuration file that merely provides a file structure, ID, and other project specific data does not and cannot possibly teach a companion file that is used to link each and every project drawing file to a project wherein such a link is based on a building information model or report as claimed.

Applicants further note that the ability to link the file based on the building information model provides the ability to manage drawing files that have different meaning in different folders. Such a functional advantage is further illustrated in claims 6-9. These claims provide a more detailed context for the building information model aspect of the claims. In this regard, the folders and respective drawing files provide for elements, constructs, views, and sheets - all of which have specific identifiable meanings as set forth in the claims. In rejecting each of these claims, the Office Action relies on Halpert. However, Halpert is not in the building information industry and is such

unrelated art that it cannot be applied to the present invention. In this regard, Halpert relates to publishing or displaying structured data at a website (see Abstract). The only mention of a project in Halpert relates to the Microsoft™ program Microsoft Project™. Thus, such a reliance in the Office Action to a project application when rejecting claims in a project having project drawing files is completely and entirely misplaced.

Claim 6 provides that an element type of a drawing file is a set of geometry that is repeated throughout a project. In rejecting this claim element, the Office Action relies on Halpert paragraph [0084]. Paragraph [0084] does not even remotely allude to a set of geometry that is repeated in a drawing file. Instead, paragraph [0084] describes the ability to import any document that has structured data into a website. Such a teaching is not relevant whatsoever to the present claims.

Claim 7 further provides that the construct type drawing file is an identification of geometry and data for a particular level/wing and category of the project and one or more elements. Again, the level/wing aspect of the claims specifically relates to the building industry. In rejecting this claim, the Office Action relies on Bondy paragraph [0030] which states that a component tag is a descriptor identifying a type of information being sent. Applicants do not understand the relevance of such a recitation to the present claims. Such a statement does not disclose geometry, a level/wing, a category of a project, or elements, as claimed.

Claim 8 provides that the view type drawing file automatically assembles constructs to represent a portion of a project that has been selected based upon user specified data. In rejecting this claim, the Office Action relies on Halpert paragraph [0092]. This paragraph describes the steps that occur when a file is dropped onto an Inbox. Again, the relevance of such a description with respect to the present claims is unknown.

Claim 9 provides that the sheet type drawing file has one or more views and represents a printed/Plotted document. In rejecting these claims, the Office Action relies on Bondy paragraph [0039] which describes the formatting of personalized catalogs for printing. However, there is no teaching or suggestion in Bondy relating to views for a drawing sheet as claimed.

Again, claims 6-9 (in combination with claim 5) are specifically directed towards the building industry and a CAD application having elements, constructs, views, and sheets. Such claim limitations are not even remotely alluded to in any of the cited references. In this regard, the reliance on both Bondy and Halpert is totally misplaced and illogical.

Moreover, the various elements of Applicants' claimed invention together provide operational advantages over Bondy and Halpert. In addition, Applicants' invention solves problems not recognized by Bondy and Halpert.

Thus, Applicants submit that independent claims 1, 11 and 21 are allowable over Bondy and Halpert. Further, dependent claims 2-10, 12-20 and 22-30 are submitted to be allowable over Bondy and Halpert in the same manner, because they are dependent on independent claims 1, 11 and 21, respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 2-10, 12-20 and 22-30 recite additional novel elements not shown by Bondy and Halpert.

III. Conclusion

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

Respectfully submitted,

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